

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

In re Application of: Harvey et al.  
Serial No.: 10/648,606  
Filing Date: August 25, 2003  
Group Art Unit: 2164  
Examiner: Alicia M. Lewis  
Confirmation No.: 4231  
Title: WEB SERVICES APPARATUS AND METHODS

**MAIL STOP AF**  
Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450

Dear Sir:

**PRE-APPEAL BRIEF REQUEST FOR REVIEW**

The following Pre-Appeal Brief Request for Review (“Request”) is being filed in accordance with the provisions set forth in the Official Gazette Notice of July 12, 2005 (“OG Notice”). Pursuant to the OG Notice, this Request is being filed concurrently with a Notice of Appeal. Applicants respectfully request reconsideration of the application in light of the remarks set forth below.

**REMARKS**

In a final Office Action dated March 17, 2009 (the “Final Office Action”) Claims 1-10 were rejected. Applicants seek review of the rejection of Claim 10. Applicants do not seek review in this Request of the rejections of Claims 1-9. Applicants request a finding that the rejection of Claim 10 is improper.

**Section 103 Rejections**

The Final Office Action rejects Claim 10 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Publication No. 2004/0204958 by Perkins et al. (“*Perkins*”) in view of in view of U.S. Patent No. 7,200,869 B1 to Hacherl et al. (“*Hacherl*”) and further in view of U.S. Publication No. 2004/0002955 A1 by Gadbois et al. (“*Gadbois*”). Applicants respectfully traverse these rejections for the reasons below.

Claim 10 is directed to a Web Services system that includes a registry in which businesses may register. The registry includes a hierarchical directory including at least one Domain object, at least one User object, at least one Business Entity object, at least one Business Service object, at least one Binding Template object, and at least one TModel object. The at least one Domain object includes a directory prefix name, and the at least one Domain object is a root object of the hierarchical directory. The at least one User object identifies a user account for managing the at least one Business Entity object arranged under the at least one User object. The at least one User object is arranged under the at least one Domain object. The at least one User object comprises security information defining what objects a user has access to in the hierarchical directory, and the at least one User object grants access to the user based on the security information. The at least one Business Entity object includes at least one business name and at least one business contact. The at least one business contact includes at least one business address. The at least one Business Service object includes data identifying a technical service. The at least one Business Service object is arranged under the at least one Business Entity object. The at least one Binding Template object includes data identifying a plurality of service specifications. The at least one Binding Template object is arranged under the at least one Business Service object. The at least one TModel object comprises a keyed reference to the at least one Binding Template object. The at least one TModel object is arranged under the at least one User object. The Web Services

system includes a storage system for storing business information and is accessible via the hierarchical directory. The cited references do not teach or suggest these limitations.

For example, the cited references fail to teach or suggest “at least one TModel object, wherein the at least one TModel object comprises a keyed reference to the at least one Binding Template object, and the at least one TModel object is arranged under the at least one User object.” The Final Office Action contends that Paragraphs 38-39 and 47 of *Gadbois* discloses this limitation. Applicants respectfully disagree. *Gadbois* discloses a keyed reference that may refer to a tModel identifier. *See Gadbois*, Paragraph 39. However, at no point does *Gadbois* teach or suggest that the tModel identifier refers to a **Binding Template object**, and *Gadbois* certainly does not teach or suggest that the tModel identifier is **arranged under at least one User object**. Thus, *Gadbois* does not teach or suggest “at least one TModel object, wherein the at least one TModel object comprises a keyed reference to the at least one Binding Template object, and the at least one TModel object is arranged under the at least one User object.” *Perkins* and *Hacherl* fail to cure this deficiency.

As another example, the cited references fail to teach or suggest “at least one Binding Template object, wherein the at least one Binding Template object comprises data identifying a plurality of service specifications.” The Final Office Action concedes that *Perkins* and *Hacherl* do not teach or suggest this limitation. *See Final Office Action*, Page 13. Instead, the Final Office Action contends that Paragraph 28 of *Gadbois* discloses this limitation. Applicants respectfully disagree. *Gadbois* discloses Binding node 245 and explains that “one type of binding is a uniform resource locator (URL).” *See Gadbois*, Paragraph 28. Applicants respectfully submit that a URL does not teach or suggest data identifying a **plurality of service specifications** because a URL, at best, identifies a **single address**. Thus, *Gadbois* does not teach or suggest “at least one Binding Template object, wherein the at least one Binding Template object comprises data identifying a plurality of service specifications.”

As another example, the cited references fail to teach or suggest “a registry in which businesses may register . . . comprising . . . at least one User object, wherein . . . the at least one User object comprises security information defining what objects a user has access to in the hierarchical directory.” The Final Office Action concedes that *Perkins* does not teach or suggest this limitation. *See Final Office Action*, Pages 11-12. Instead, the Final Office

Action contends that *Hacherl* discloses this limitation. Applicants respectfully disagree. *Hacherl* discloses a user account in an operating system. *See Hacherl*, Column 6, lines 30-36. Applicants respectfully submit that a user account in an operating system in no way teaches or suggests a User object in a **registry in which businesses may register**. Thus, *Hacherl* does not teach or suggest “a registry in which businesses may register . . . comprising . . . at least one User object, wherein . . . the at least one User object comprises security information defining what objects a user has access to in the hierarchical directory.”

For at least the reasons above, Applicants respectfully contend that Claim 10 is patentably distinguishable from the cited references. Thus, Applicants respectfully submit that the rejection of Claim 10 under 35 U.S.C. § 103(a) is improper.

**CONCLUSION**

As the rejection of Claim 10 contains clear legal and factual deficiencies, Applicants respectfully request a finding of allowance of Claim 10. If the PTO determines that an interview is appropriate, Applicants would appreciate the opportunity to participate in such an interview. To the extent necessary, the Commissioner is hereby authorized to charge any required fees or credit any overpayments to **Deposit Account No. 02-0384 of Baker Botts L.L.P.**

Respectfully submitted,



Luke K. Pedersen  
Reg. No. 45,003  
Phone: (214) 953-6655

Date: 6-15-09

**CORRESPONDENCE ADDRESS:**

Customer Number: **05073**